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Attorneys for Defendant
SOUTHWEST BUSINESS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARGO PERRYMAN, on behalf of herself
and others similarly situated,

Plaintiff,

vs.

LITTON LOAN SERVICING, LP; OCWEN
LOAN SERVICING LLC; SOUTHWEST
BUSINESS CORPORATION; AMERICAN
SECURITY INSURANCE COMPANY, and
DOES 1-100, inclusive

Defendants.

Case No. 3:14-cv-02261-JST

JOINT STIPULATION RE DEFENDANT
SOUTHWEST BUSINESS
CORPORATION'S RESPONSE TO
PLAINTIFF'S SECOND AMENDED
COMPLAINT

Date: TBD
Time: TBD
Judge: Hon. Jon S. Tigar
Courtroom: 9, 19th Floor

Pursuant to Civil L.R. 7-12, 6-1 (b), it is hereby stipulated by and between Southwest
Business Corporation ("SWBC") and plaintiff Margo Perryman ("Perryman") through their
respective attorneys, that:

WHEREAS, on February 26, 2015, pursuant to Fed. R. Civ. P. 12(b)(6), the Court
dismissed Perryman's First Amended Complaint as against SWBC, with leave to amend;

WHEREAS, on September 14, 2015, the Final Judgment was entered in *Lee v. Ocwen
Loan Servicing, LLC, Assurant Inc. and American Security Insurance Co.*, Case No. 0:14-60649-
JAL (S.D.Fla.) ("*Lee*"), which judgment enjoins Perryman from prosecuting her claims against
certain defendants in this action;

1 WHEREAS, Perryman has filed a Notice of Appeal in *Lee*, and filed her opening appellate
2 brief in the 11th Circuit on December 23, 2015;

3 WHEREAS, on January 14, 2016 the United States District Court for the Southern District
4 of New York preliminarily approved a class settlement in *Lyons et al. v. Litton Loan Servicing LP*
5 *et al.*, Case No. 1:13-cv-00513 (S.D.N.Y.) ("*Lyons*"), which preliminary approval order enjoins
6 Perryman from prosecuting her claims against certain defendants in this action;

7 WHEREAS, on January 15, 2016, Perryman filed a Second Amended Complaint (SAC),
8 including claims against SWBC;

9 WHEREAS, SWBC intends to file a motion to stay this action as to SWBC pending final
10 resolution of the settlement proceedings in *Lee* and *Lyons*;

11 WHEREAS, Perryman and SWBC agree that, SWBC's time to respond to the SAC, should
12 be extended until such date as the Court sets, if any, upon resolution of SWBC's motion to stay;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject
14 to the Court's approval:

- 15 • SWBC's time to respond to the SAC shall be set by the Court upon resolution of SWBC's
16 motion to stay; and
- 17 • This will not alter the existing deadlines for other defendants in this action.

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21 SEEN AND AGREED:

22 Dated: January 28, 2016

LAW OFFICE OF SHERI L. KELLY

23 By: /s/Sheri L. Kelly

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1 Dated: January 28, 2016

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3 By: /s/Dennis J. Kelly
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8 **FILER'S ATTESTATION**

9 The undersigned filer attests, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the
10 filing of the documents has been obtained from the other signatory to this document.

11 Dated: January 28, 2016

DILLINGHAM & MURPHY, LLP

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13 By: /s/Dennis J. Kelly
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Corporation

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

- SWBC's time to respond to the SAC shall be set by the Court upon resolution of SWBC's motion to stay; and
- This will not alter the existing deadlines for other defendants in this action.

Dated: January 29, 2016

